Case 21-40512 Doc 60 Filed 08/09/21 Entered 08/09/21 14:58:38 Desc Main Document Page 1 of 2

Megan M. Adeyemo (TX. Bar #24099595) GORDON REES SCULLY MANSUKHANI, LLP 2200 Ross Avenue, Suite 3700 Dallas, TX 75201

Ph: (214) 231-4660 / Fax: (214) 461-4053

Email: madeyemo@grsm.com

Attorneys for CELTIC BANK CORPORATION

UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

In re:)
TROPHY HOSPITALITY, LLC,) Case No.: 21-40512-11
Debtor.) Chapter 11

CELTIC BANK CORPORATION'S NOTICE OF 1111(B) ELECTION WITH RESPECT TO DEBTOR'S CHAPTER 11 PLAN OF REORGANIZATION (SMALL BUSINESS DEBTOR-SUBCHAPTER V)

Celtic Bank Corporation ("Celtic Bank"), is the holder of a \$1,794,983.54 claim against Trophy Hospitality, LLC (the "Debtor") secured by the Debtor's assets, as more particularly described in Celtic Bank's proof of claim filed in Debtor's bankruptcy case as Claim Number 3 ("Claim"). Celtic Bank hereby elects application of Bankruptcy Code section 1111(b)(2) to its Claim under Debtor's "Plan of Reorganization of Trophy Hospitality, LLC Pursuant to Section 1190 of the Bankruptcy Code Dated July 7, 2021" [Dkt. No. 43] (the "Plan") such that its Claim shall be treated as secured to the full extent that the Claim is allowed.

This election is made with respect to the Debtor's Plan, only, which currently seeks to treat Celtic Bank both as a member of the "Class 5 Claimants (Allowed Unsecured Claims) and as a member of "Class 4 Claimants (Allowed Secured Claims of Celtic Bank)." Celtic Bank reserves the right to withdraw this election, including if the Plan is amended, modified, or not confirmed. Celtic Bank also reserves the right to choose whether or not to make an election under section 1111(b)(2) with respect to any other plan of reorganization that might be filed in this case.

Dated: August 9, 2021

GORDON REES SCULLY MANSUKHANI, LLP

By: /s/ Megan M. Adeyemo

Megan M. Adeyemo 2200 Ross Avenue, Suite 3700

Dallas, TX 75201

Ph: (214) 231-4660 / Fax: (214) 461-4053

Email: madeyemo@grsm.com

CERTIFICATE OF SERVICE

The undersigned certifies that on August 9, 2021, a true and correct copy of the foregoing document was electronically filed and served via CM/ECF on all parties that have entered an appearance and requested service in the above-referenced case.

/s/ Anita Soto

For Gordon Rees Scully Mansukhani LLP